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12 *Attorneys for Defendant*  
13 *New Classic Home Furnishing, Inc.*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 WMCV PHASE 1 SPE, LLC, a Delaware  
17 limited liability company,

18 v.  
19 Plaintiff

20 NEW CLASSIC HOME FURNISHING, INC., a  
21 California corporation; DOE INDIVIDUALS I-  
22 X; and ROE BUSINESS ENTITIES I-X,

23 Defendants

24 CASE NO.: 2:23-cv-01044-CDS-NJK

25 **STIPULATION AND ORDER TO  
26 EXTEND TIME TO RESPOND TO  
27 PLAINTIFF'S MOTION TO REMAND  
28 (ECF NO. 12)  
(FIRST REQUEST)**

29 Defendant, NEW CLASSIC HOME FURNISHING, INC., (“New Classic” or “Defendant”),  
30 and Plaintiff, WMCV PHASE 1 SPE, LLC (“Plaintiff”), by and through their undersigned attorneys,  
31 hereby stipulate, pursuant to LR IA-6-1 and 6-2, to extend the deadline for New Classic to respond  
32 to the Motion to Remand, ECF No. 12, filed by Plaintiff on July 18, 2023 (“Motion”) for two days  
33 from August 1, 2023 until and including August 3, 2023. Absent the extension, the deadline for New  
34 Classic to respond to the Motion is August 1, 2023. This is the first request by the Parties for an  
35 extension of this deadline.

36 This stipulation is made in good faith and not in an attempt to delay proceedings, but rather  
37 is made because counsel for Defendant and counsel for Plaintiff have been discussing with each  
38 other and their respective clients the possibility of resolving the Motion without the need for this  
39 Court’s ruling. Counsel for the Parties engaged in discussions for two days to explore a stipulation

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1 that would resolve the Motion but have been unable to come to an agreement at this time. As such,  
2 the stipulated extension extends the time for Defendant's response to the Motion by a timeframe  
3 commensurate with such discussions between counsel.

4 DATED this 31st day of July, 2023.

DATED this 31st day of July, 2023.

5 **HOLLAND & HART LLP**

6 **SEMENTZA KIRCHER RICKARD**

7 By: /s/ Sydney R. Gambee

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14 *Attorneys for Plaintiff*  
15 *WMCV Phase 1 SPE, LLC*

16 **ORDER**

17 IT IS SO ORDERED.

18   
19 UNITED STATES DISTRICT JUDGE

20 DATED: August 1, 2023

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